

REVISED DRAFT
ENVIRONMENTAL IMPACT REPORT

THE INSTITUTE
GOLF COURSE

City of Morgan Hill

December 2003

TABLE OF CONTENTS

PREFACE

SUMMARY

I. DESCRIPTION OF THE PROJECT

A.	OVERVIEW OF THE PROJECT	1
B.	PROJECT LOCATION	1
C.	DESCRIPTION OF THE PROJECT	1
D.	PROJECT OBJECTIVES	7
E.	CONSISTENCY WITH ADOPTED PLANS AND POLICIES	7
F.	USES OF THE EIR	16

II. DESCRIPTION OF THE ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION

A.	LAND USE	17
B.	GEOLOGY AND SOIL	24
C.	VEGETATION AND WILDLIFE	28
D.	HYDROLOGY AND WATER QUALITY	54
E.	WATER SUPPLY	80
F.	TRAFFIC AND CIRCULATION	86
G.	NOISE	89
H.	HAZARDOUS MATERIALS	92
I.	AIR QUALITY	96
J.	CULTURAL RESOURCES	101
K.	ENERGY	103
L.	UTILITIES	104
M.	PUBLIC SERVICES	106

III. SECONDARY IMPACTS

107

IV. CUMULATIVE IMPACTS

116

V. ALTERNATIVES TO THE PROPOSED PROJECT

121

VI. SIGNIFICANT UNAVOIDABLE IMPACTS OF THE PROJECT

128

VII. GROWTH INDUCING IMPACTS OF THE IMPACTS

130

VIII. AUTHORS AND CONSULTANTS

131

IX. REFERENCES

132

Figures

Figure 1	Regional Location Map	2
Figure 2	Vicinity Map	3
Figure 3	Golf Course Layout	6
Figure 4	Aerial Photograph	18
Figure 5	Soils Map	25
Figure 6	Biotic Habitats	29
Figure 7	Regulated Habitats	40
Figure 8	Flood Map	56
Figure 9	Pre-Existing and Current Grades	108
Figure 10	Historic and Recent Aerial Photographs	109

Photographs

Photo 1	23
---------------	----

Tables

Table 1	Habitat Acreage	28
Table 2	Land Use Summary	58
Table 3	Runoff Estimates	65
Table 4	On-site Well Nitrate Concentrations	81
Table 5	Pending Projects	117

Appendices

Appendix A:	Land Conservation Agreement
Appendix B:	Geology and Soils
Appendix C:	Vegetation and Wildlife
Appendix D:	Hydrology, Water Quality, and Water Supply
Appendix E:	Cultural Resources

PREFACE

This document has been prepared by the City of Morgan Hill as the Lead Agency in conformance with the California Environmental Quality Act (CEQA). In accordance with CEQA, this EIR provides objective information regarding the environmental consequences of the proposed project, and identifies possible means for mitigating impacts. The EIR also examines various alternatives to the project in order to reduce or eliminate significant environmental impacts.

The following guidelines are included in CEQA to clarify the role of an EIR:

Section 15121(a) Informational Document. An EIR is an informational document which will inform public agency decision makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR, along with other information which may be presented to the agency.

Section 15151 Standards for Adequacy of an EIR. An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information that enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good-faith effort at full disclosure.

Recirculation of an EIR

Section 15088.5 of the CEQA Guidelines addresses recirculation of an EIR. Recirculation is required when significant new information is added to an EIR before its certification. "Significant new information" can include changes in the project itself, changes in the existing setting, and/or other additional data becoming available.

From January 24 to March 10, 2003, a Draft EIR was circulated for the proposed project. After the DEIR was circulated, the proposed project was revised by the project proponent to include new mitigation measures for some of the significant impacts that were identified in the previously circulated EIR, and to include new land uses not previously identified as part of the proposed project. The new mitigation measures were primarily for biological, hydrological, and geological impacts identified in the previously circulated Draft EIR, and included setbacks from the creeks on the site, a hydrology report, and a geology report. New land uses proposed by the project include the renovation and use of other structures on the project site as support facilities for the Mathematics Institute, including: residence for mathematicians; a restroom; caretaker's residence; equipment storage; food service; a lecture hall; offices; and a guard building.

On August 20, 2003, the project proponent also provided an "as-built" drainage plan prepared by a civil engineer. The City of Morgan Hill and the City's consultants have reviewed the new project description, supporting documents provided by the project proponent, and the "as-built" drainage plan. The revised project will result in impacts similar to those identified in the previously circulated Draft EIR.

Due to newly available information and requests by those who commented on the previously circulated Draft EIR for that information, the DEIR was revised and is being recirculated. The purpose of this revised DEIR is to inform decision makers and the general public of the environmental effects of the currently proposed project. In accordance with Section 15088.5(f)(1) of the CEQA Guidelines, when the entire EIR is recirculated, as in this case, the City of Morgan Hill will not respond to the comments received during the previous circulation of the EIR and is requiring that reviewers submit new comments.

Substantive revisions were made to the following sections of the EIR:

- Project Description
- Geology and Soil
- Vegetation and Wildlife
- Hydrology and Water Quality
- Water Supply

Reflecting those changes, there are also revisions in the sections entitled: Cumulative Impacts, Alternatives to the Proposed Project, and Significant Unavoidable Impacts of the Project. Minor edits to consistently reflect the proposed project have been made throughout the document.

All documents referenced in this EIR are available for public review in the office of the City of Morgan Hill Community Development Department located at 17555 Peak Avenue, Morgan Hill, California, during normal business hours.

SUMMARY

The proposed project is a Planned Development Rezoning to allow for the continued operation of an existing 18-hole golf course (including the use of the renovated hanger building as a maintenance building), the renovation of the existing 58,946-square foot restaurant building on the site (former Flying Lady restaurant) for use as the headquarters of the American Institute of Mathematics, and the renovation and use of other structures on the project site as support facilities, including: residence for mathematicians; a restroom; caretaker's residence; equipment storage; food service; a lecture hall; offices; and a guard building.

Because the golf course is already built, and was almost completed before work on this EIR began, the evaluation of pre-project conditions is limited by the information available from historic records. In addition, further construction on the project site was taking place during the preparation of the EIR. Development known to occur during the preparation of this EIR included construction of a wastewater treatment facility, a fishing pond, and various golf course features such as greens, tee boxes, and sand traps. In addition, various earthmoving activities occurred on the site while the EIR was in preparation.

Following is a **brief summary** of project impacts and mitigation measures. Complete descriptions of the existing setting, impacts and mitigation measures can be found in the EIR text which follows.

ENVIRONMENTAL IMPACTS

MITIGATION MEASURES

Land Use Impacts

The proposed project is not expected to result in significant land use impacts to surrounding land uses. Existing land uses on and adjacent to the project site will not cause significant land use impacts to the project. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

The proposed project will not result in the loss of designated important farmland. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

Cancellation of the Land Conservation Act contract and payment of appropriate fees will reduce conflicts with the LCA contract. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

The visual changes resulting from the proposed project will not result in a significant environmental impact. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

Geology and Soils Impacts

The proposed project may result in erosion and siltation. **(Significant Impact)**

Specific mitigation measures have been identified on page 27 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 27 - Mitigation Not Presently Proposed By Project)**

The proposed project could result in significant seismic impacts associated with existing conditions. **(Significant Impact)**

The existing restaurant building is currently closed and the project proponent has indicated that it will not be occupied until the structural stability of the building is confirmed by a certified engineer. **(Less Than Significant Impact)**

Vegetation and Wildlife Impacts

Play on the golf course, golf course maintenance, and renovation of the restaurant building and other structures on the project site will not impact special-status plant species. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

On-going use and maintenance of the golf course may have a substantial adverse effect on California red-legged Frogs, a threatened species listed under the Federal Endangered Species Act. **(Significant Impact)**

Specific mitigation measures have been identified on page 50 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 50 - Mitigation Not Presently Proposed By Project)**

On-going use and maintenance of the golf course may have a substantial adverse effect on California tiger salamanders, a Candidate species listed under the Federal Endangered Species Act. **(Significant Impact)**

Specific mitigation measures have been identified on page 52 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 52 - Mitigation Not Proposed By Project)**

Vegetation and Wildlife Impacts, cont.

On-going use and maintenance of the golf course may have a substantial adverse effect on riparian habitat. **(Significant Impact)**

Specific mitigation measures have been identified on page 53 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 53 - Mitigation Not Presently Proposed By Project)**

On-going use and maintenance of the golf course may have a substantial adverse effect on western pond turtles, a Species of Special Concern listed under the California Endangered Species Act. **(Significant Impact)**

Specific mitigation measures have been identified on page 50 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 50 - Mitigation Not Presently Proposed By Project)**

Future construction or certain maintenance activities on the project site may result in the "take" of burrowing owls. **(Significant Impact)**

Specific mitigation measures have been identified on page 44 of this EIR that will reduce this impact to a less than significant level. **(Less Than Significant Impact With Proposed Mitigation)**

Future construction on the project site could disturb nesting raptors, which would result in the loss of eggs, young or the reproductive effort. **(Significant Impact)**

Specific mitigation measures have been identified on page 45 of this EIR that will reduce this impact to a less than significant level. **(Less Than Significant Impact With Proposed Mitigation)**

The renovation and/or use of the existing restaurant building or other buildings on the site could disturb nesting swallows, which would result in the loss of eggs, young or the reproductive effort. **(Significant Impact)**

Specific mitigation measures have been identified on page 45 of this EIR that will reduce this impact to a less than significant level. **(Less Than Significant Impact With Proposed Mitigation)**

Vegetation and Wildlife Impacts, cont.

The renovation and/or use of the existing restaurant building or the removal of large trees on the site may disturb or destroy roosting pallid and/or Townsend big-eared bats. **(Significant Impact)**

Specific mitigation measures have been identified on page 49 of this EIR that will reduce this impact to a less than significant level. **(Less Than Significant Impact With Proposed Mitigation)**

On-going use and maintenance of the golf course and on-site pavement may degrade water quality downstream of the project site, which provides habitat for several special-status species. **(Significant Impact)**

Specific mitigation measures have been identified on page 73 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 73 - Mitigation Not Presently Proposed By Project)**

Hydrology and Water Quality Impacts

Golf course encroachment into the floodplain will not result in flood related property loss or a hazard to human life. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

The increased runoff from development and continued use of the 18-hole golf course will exacerbate existing flood conditions, causing worse and more frequent flooding problems on the roadway and on other nearby properties. **(Significant Impact)**

Specific mitigation measures have been identified on page 73 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 73 - Mitigation Not Presently Proposed By Project)**

Future grading may increase soil erosion on the site. **(Significant Impact)**

Specific mitigation measures have been identified on page 73 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 73 - Mitigation Not Presently Proposed By Project)**

Hydrology and Water Quality Impacts, cont.

The proposed project will result in a net increase of non-point source pollutants entering surface waters. **(Significant Impact)**

Specific mitigation measures have been identified on page 74 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 74 - Mitigation Not Presently Proposed By Project)**

On-going use and maintenance of the golf course will substantially increase existing nitrogen levels in the groundwater. This could adversely affect nearby drinking water wells, as well as the aquifer as a whole. **(Significant Impact)**

Specific mitigation measures have been identified on page 72 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 72 - Mitigation Not Presently Proposed By Project)**

On-going use and maintenance of the golf course will result in potentially higher nitrogen loading to downstream surface waters, including Corralitos Creek, San Martin Creek and Llagas Creek. **(Significant Impact)**

Specific mitigation measures have been identified on page 75 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 75 - Mitigation Not Presently Proposed By Project)**

On-going use and maintenance of the golf course could contaminate on-site drainages and the downstream reaches of Corralitos Creek, San Martin Creek and Llagas Creek with pesticides, and could contaminate the groundwater below the site with pesticides. **(Significant Impact)**

Specific mitigation measures have been identified on page 76 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 76 - Mitigation Not Presently Proposed By Project)**

ENVIRONMENTAL IMPACTS

MITIGATION MEASURES

Hydrology and Water Quality Impacts, cont.

The compliance with the terms and specific conditions of the SWPPP will reduce the impact from future maintenance and construction activities to a less than significant level. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

Discharge of water from the golf course lakes to Corralitos Creek or to the drainage along Foothill Avenue could potentially impact the water quality and beneficial uses of Corralitos Creek, San Martin Creek and Llagas Creek. **(Significant Impact)**

Specific mitigation measures have been identified on page 78 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 78 - Mitigation Not Presently Proposed By Project)**

The proposed project will not change the groundwater recharge characteristics of the project site. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

Water Supply Impacts

Irrigation of the proposed project may substantially deplete groundwater resources. **(Significant Impact)**

Specific mitigation measures have been identified on page 84 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 84 - Mitigation Not Presently Proposed By Project)**

The proposed project does not have an acceptable source of potable water, which may present a health hazard to workers and visitors at the project site. **(Significant Impact)**

Specific mitigation measures have been identified on page 83 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 83 - Mitigation Not Presently Proposed By Project)**

ENVIRONMENTAL IMPACTS

MITIGATION MEASURES

Traffic Impacts

The fire/irrigation water supply may not be sufficient to serve the additional fire water requirements of the proposed headquarters of the American Institute of Mathematics, which may result in property loss or a hazard to human life. **(Significant Impact)**

Specific mitigation measures have been identified on page 84 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 84 - Mitigation Not Presently Proposed By Project)**

The proposed project will not generate traffic that would exceed the capacity of the existing roadway system. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

Noise Impacts

The proposed project will not significantly increase or be affected by ambient noise levels in the project area. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

The proposed project may result in significant short-term noise impacts during any future construction. **(Significant Impact)**

Specific mitigation measures have been identified on page 91 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 91 - Mitigation Not Presently Proposed By Project)**

Hazardous Material Impacts

Management of hazardous materials and disposal of hazardous waste in conformance with federal, state, and local regulations will not result in a significant impact to the environment or the people occupying the site. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

Hazardous Material Impacts, cont.

The existing structures on the project site may contain ACMs or lead based paint. Demolition or remodeling may release air-borne asbestos and/or lead dust, causing a significant impact to workers or other persons in the area. **(Significant Impact)**

Specific mitigation measures required by the City of Morgan Hill have been identified on page 94 of this EIR that will reduce this impact to a less than significant level **(Less Than Significant Impact With Required Mitigation)**

Air Quality Impacts

Vehicle trips generated by the project would not exceed BAAQMD thresholds, therefore, the proposed project is not expected to have a significant impact on air quality. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

Construction of any remaining components of the proposed project could result in significant short term air quality impacts associated with dust generation. **(Significant Impact)**

Specific mitigation measures have been identified on page 99 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 99 - Mitigation Not Presently Proposed By Project)**

The proposed project may expose members of the public to objectionable odors. **(Significant Impact)**

Specific mitigation measures have been identified on page 100 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 100 - Mitigation Not Presently Proposed By Project)**

Cultural Resources Impacts

The proposed project will not result in the future disturbance of cultural resources. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

ENVIRONMENTAL IMPACTS

MITIGATION MEASURES

Energy Impacts

The continued operation of the golf course and proposed use of the existing buildings on the site will not require a substantial amount of energy. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

Utilities Impacts

The continued operation of the golf course and proposed use of the existing restaurant building will not result in significant environmental impacts associated with providing sanitary sewer, electricity and gas, solid waste, or telephone services. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

Public Services Impacts

The development of the proposed project will not result in the need for additional fire protection or police facilities. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

SECONDARY IMPACTS

The impacts listed previously are the *direct* result of the proposed project. Approval of the proposed project could also result in significant *indirect* environmental impacts. The CEQA guidelines define secondary effects as those which are caused by the project and are later in time or are farther removed in distance, but are still reasonably foreseeable.

The approval of the Planned Development Rezoning is a discretionary act, which means the City has the option to disapprove the proposed project and require the land owner to return approximately 150 acres of the land to the condition it was prior to the illegal grading having occurred. If the City approves the proposed project, they will forgo this option to have the project site restored to pre-grading conditions, which is an indirect result of approving the project. Restoring the land to pre-grading conditions would mitigate many (but not all) of the impacts that resulted during or from the construction of the existing golf course. If the proposed project is approved as it is proposed, the following impacts that occurred as a result of constructing the project will not be reversed, reduced, or mitigated.

Loss of Habitat for Special-Status Plant Species

Approval of the proposed project will result in the permanent loss of habitat that may have contained Special-Status Plant Species.
(Significant Impact)

Specific mitigation measures have been identified on page 111 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 111 - Mitigation Not Presently Proposed By Project)**

Riparian Habitats

Golf course development has removed riparian habitat. **(Significant Impact)**

Specific mitigation measures have been identified on page 111 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 111 - Mitigation Not Presently Proposed By Project)**

Ordinance-Size Trees

Golf course development resulted in the removal of ordinance size trees. **(Significant Impact)**

Specific mitigation measures have been identified on page 112 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 112 - Mitigation Not Presently Proposed By Project)**

California Red-legged Frog Habitat/Aquatic Habitat

Golf course development resulted in the loss of California red-legged frog breeding habitat. **(Significant Impact)**

Specific mitigation measures have been identified on page 112 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 112 - Mitigation Not Presently Proposed By Project)**

ENVIRONMENTAL IMPACTS

MITIGATION MEASURES

California Tiger Salamander Aestivation/Breeding Habitat

Golf course development resulted in the loss of California tiger salamander aestivation /breeding habitat. **(Significant Impact)**

Specific mitigation measures have been identified on page 114 of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified On Page 114 - Mitigation Not Presently Proposed By Project)**

CUMULATIVE IMPACTS

Agricultural Land

The proposed project would contribute to a significant cumulative loss of agricultural land in the project area and Sant Clara County. **(Significant Impact)**

There is no mechanism in place to achieve mitigation for the identified cumulative loss of agricultural land. **(Significant Unavoidable Cumulative Impact)**

Special-Status Plant Species

The construction of the golf course, and its continued operation as proposed, would contribute to a significant cumulative loss of special-status plant species (serpentine) habitat. **(Significant Impact)**

Specific mitigation measures have been identified in **Section II., C., Vegetation and Wildlife** of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified In Section II., C., Vegetation And Wildlife- Mitigation Not Presently Proposed By Project)**

Special-Status Animal Species

The construction of the golf course, and its continued operation as proposed, would contribute to a significant cumulative loss of special-status animal species habitat. **(Significant Impact)**

Specific mitigation measures have been identified in **Section II., C., Vegetation and Wildlife** of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified In Section II., C., Vegetation And Wildlife- Mitigation Not Presently Proposed By Project)**

ENVIRONMENTAL IMPACTS

MITIGATION MEASURES

Groundwater Quality

The proposed project will not contribute to a significant cumulative groundwater quality impact. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

Runoff

The proposed project will contribute to impacts resulting from significant cumulative increases in surface water runoff, including flooding. **(Significant Impact)**

Specific mitigation measures have been identified in **Section II., D., Hydrology and Water Quality** of this EIR that will reduce this impact to a less than significant level, however, they are not proposed by the project. **(Less Than Significant Impact With Mitigation Identified In Section II., D., Hydrology and Water Quality - Mitigation Not Presently Proposed By Project)**

Water Supply

The proposed project will not contribute to a significant cumulative water supply impact. **(Less Than Significant Impact)**

No significant adverse impact has been identified; no mitigation is required. **(Less Than Significant Impact)**

SUMMARY OF ALTERNATIVES

CEQA requires that an EIR identify alternatives to a project, as proposed. The CEQA Guidelines specify that the EIR identify alternatives which “would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen many of the significant environmental effects of the project”.

The significant unmitigated impacts identified from the proposed project include impacts in the areas of soils and geology, vegetation and wildlife, hydrology and water quality, water supply, noise, and hazardous materials. In most cases, mitigation has been identified which is not included in the proposed project but could be required by the City as conditions of project approval.

Consideration of a "No Project" alternative is mandatory. In addition, an alternative which includes on-site measures to reduce most of the significant impacts identified for the proposed project was also developed, based on the "mitigation not currently incorporated in the proposed project" that is described throughout this EIR. The analysis of an alternative location was not completed because the project has already been built on the project site. Each of these alternatives is discussed briefly on the following page.

A. NO PROJECT ALTERNATIVE

The No Project Alternative includes the development allowed by the grading permit issued in 1997 and the conversion of the remainder of the project site developed with the existing golf course (approximately 150 acres) to pre-grading conditions. Pre-grading conditions on the site would be determined through the use of historic aerial photos and other historical documentation of the project site. The No Project Alternative would reduce many (but not all) of the of the identified significant impacts anticipated to occur or that have already occurred as a result of the proposed project. The No Project Alternative would be environmentally superior to the proposed project.

B. REDUCED IMPACT ON-SITE ALTERNATIVE

The Reduced Impact On-site Alternative would be designed to avoid or reduce all identified impacts to a less than significant level. It should be noted that the elements included in this alternative include some of the "Mitigation Measures Not Currently Incorporated Into the Proposed Project", discussed elsewhere in this EIR. This alternative includes all of the mitigation that can be implemented on-site (without off-site elements). Many of these elements could be incorporated into the project as conditions of approval, part of the permitting process. The Reduced Impact Alternative would be environmentally superior to the proposed project.

KNOWN VIEWS OF LOCAL GROUPS AND AREAS OF PUBLIC CONTROVERSY

At this time, concern has been expressed to the City of Morgan Hill from the following organizations regarding the project's impacts to Corralitos Creek and riparian areas on the project site: Streams For Tomorrow; Santa Clara Valley Audubon Society, and Committee For Green Foothills.

ISSUES TO BE RESOLVED

This EIR identifies 27 significant unmitigated impacts for which there are one or more alternative mitigation measures identified to reduce the impact to a less than significant level. The City may choose to require mitigation for some or all of the identified impacts as a condition of project approval. The significant impacts for which alternative mitigation is identified includes the following:

1. Potentially unstable slopes.
2. The "take" of California red-legged frogs.
3. The "take" of California tiger salamanders.
4. The "take" of western pond turtles.
5. The "take" of steelhead rainbow trout downstream of the project site.
6. Worsening flood conditions in the project area.
7. Increasing soil erosion on the site.
8. Degrading surface water with non-point source pollutants.
9. Increasing nitrogen levels in the groundwater.
10. Increasing nitrogen levels in the surface water.
11. Degrading surface water with pesticides.
12. Pond water discharges.
13. Depleting groundwater resources.
14. Unacceptable source of drinking water.
15. Insufficient supply water for fire fighting.